

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

WILLIAM NOSTHEIDE	)	CASE NO.: 1:24-cv-00344
	)	
Plaintiff,	)	JUDGE MATTHEW McFARLAND
	)	
v.	)	<b><u>MOTION TO STRIKE</u></b>
	)	
CLARIGENT CORPORATION, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	
	)	

Plaintiff William Nostheide, by and through undersigned counsel, respectfully moves this Court pursuant to Rule 12(f) of the Federal Rules of Civil Procedure to strike Defendant Donald Wright Jr.'s improper "Response to Order to Show Cause," (Doc. 23) on the grounds that the filing contains impertinent, immaterial, and scandalous matter, and fails to comply with the Court's prior order dated February 25, 2025.

In support of this Motion, Plaintiff states as follows:

1. On February 25, 2025, the Court ordered Defendant Donald Wright Jr. ("Wright") to obtain legal counsel or otherwise notify the Court of his intent of proceeding *pro se* by a date certain – March 25, 2025. Wright failed to comply with that Order.
2. On or about March 31, 2025, Wright filed a document that purports to explain his failure to comply and which states that he is proceeding *pro se*. However, beyond simply notifying the Court of his intentions, Wright inserted unfounded legal conclusions, inflammatory accusations, and irrelevant personal information.
3. Wright's filing accuses Nostheide of causing his financial distress and impending bankruptcy – *despite lending Defendants over a quarter million dollars for which he was never repaid and working for more than a year without pay*; states that Nostheide's case is "fraudulent and without merit" despite these uncontested facts; and asserts that Plaintiff is responsible for "undue harm" to Wright—all without any factual support or connection to the relief sought in the filing.
4. Wright's statements are immaterial to the issues before the Court and constitute impertinent and scandalous matter under Rule 12(f). Wright's submission appears to be designed solely to

delay proceedings and cast Plaintiff in a false light, rather than comply with the Court's prior directive.

5. Nostheide respectfully requests that the Court strike the filing in its entirety, admonish Wright regarding further improper filings, and warn that continued failure to comply with Court orders may result in sanctions, including default judgment.

WHEREFORE, Plaintiff William Nostheide respectfully requests that the Court strike Defendant Donald Wright Jr.'s improper filing and grant such further relief as the Court deems just and appropriate.

Respectfully submitted,

/s/ Chris P. Wido

Chris P. Wido (0090441)

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*Attorney for Plaintiff William  
Nostheide*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. A copy was also sent to Clarigent Corporation its last known address of record:

5412 Courseview Drive, suite 210  
Mason, Ohio, 45040

/s/ Chris P. Wido  
Chris P. Wido (0090441)  
**SPITZ, THE EMPLOYEE'S LAW FIRM**